

HERBERT SMITH FREEHILLS  
NEW YORK LLP

Peter J. Behmke  
Michael P. Jones  
Daniel Gomez

200 Park Avenue  
New York, New York 10166  
Tel: (917) 542-7600  
Fax: (917) 542-7601

Email: Peter.Behmke@hsf.com  
Michael.Jones@hsf.com  
Daniel.Gomez@hsf.com

*Attorneys for Glencore Singapore Pte Ltd.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CLASSIC MARITIME INC., HAIKUO  
SHIPPING 1621 LTD., OCEANSURF  
OWNERS LTD., and ERWINA SHIPPING,  
LTD,

Plaintiffs,

vs.

GLENCORE SINGAPORE PTE LTD.,

Defendant

Case No. 1:24-cv-09741-MKV

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon: (i) the accompanying memorandum of law, and (ii) the Declaration of Peter J. Behmke dated March 28, 2025 (and the exhibits thereto), defendant Glencore Singapore Pte Ltd. (“GSPL”) will move this Court, pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6), to dismiss all claims contained in the First Amended Complaint (ECF No. 18) filed by plaintiffs Classic Maritime Inc., Haikuo Shipping 1621 Ltd., Oceansurf Owners Ltd., and Erwina Shipping, Ltd. GSPL’s motion shall be made before the Honorable Mary Kay Vyskocil, United

States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St,  
Courtroom 18C, New York, New York 10007.

Dated: New York, New York  
March 28, 2025

Respectfully submitted,

HERBERT SMITH FREEHILLS  
NEW YORK LLP

By: /s/ Peter J. Behmke

Peter J. Behmke

Michael P. Jones

Daniel Gomez

200 Park Avenue

New York, New York 10166

Tel: (917) 542-7600

Fax: (917) 542-7601

Email: Peter.Behmke@hsf.com

Michael.Jones@hsf.com

Daniel.Gomez@hsf.com

*Attorneys for Glencore Singapore Pte Ltd.*